

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ERIKA WILSON,

Plaintiff,

-against-

SELIP & STYLIANOU, LLP,
J & E PROCESS SERVERS,
and BENJAMIN LAMB,

Defendants.

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ADAM M. MARSHALL, an attorney duly admitted to practice law before this Court,
declares the following to be true under the penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am an associate with the law firm of Kaufman Dolowich LLP, attorneys for
Defendant Selip & Stylianou, LLP (“S&S”) in the above-captioned action.

2. I respectfully submit this declaration in support of S&S’s motion to dismiss the
First Amended Complaint (“Amended Complaint”) of Plaintiff Erika Wilson (“Wilson”) as against
S&S pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6).

3. Attached hereto as Exhibit “1” is a copy of the Amended Complaint filed at ECF
Doc. 74, without exhibits.

4. Also attached are the following exhibits to the Amended Complaint:

- Exhibit L: Summons and Complaint in Synchrony Bank v. Erika N. Wilson,
Index No. CV-5361-23/BR (Civ. Ct. Bronx. Co.) (the “Collection
Action”).
- Exhibit M: Affidavit of Service filed in the Collection Action.
- Exhibit N: EDDS Notification for the Affirmation of Service.
- Exhibit BB: Wilson’s Motion to Dismiss in the Collection Action.
- Exhibit CC: Opposition to Wilson’s Motion to Dismiss.

Case No. 1:24-cv-4108 (ALC)

DECLARATION IN SUPPORT

- Exhibit EE: Civil Court's Order Directing a Traverse Hearing.
- Exhibit II: Notice Form Mailed by the Civil Court.

5. Attached hereto as Exhibit "2" is a copy of Wilson's Answer in the Collection Action, dated August 21, 2023.

6. Attached hereto as Exhibit "3" is a copy of the Stipulation Discontinuing Action Without Prejudice filed in the Collection Action, dated June 3, 2024.

Dated: Woodbury, New York
August 8, 2025



ADAM M. MARSHALL